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September 29, 2023

**Via ECF**

Hon. Jennifer L. Rochon (U.S.D.J.)  
U.S.D.C., S.D.N.Y. (500 Pearl Street)

Re: *Donoghue v. ZScaler, Inc., et. al.*, No. 23-CV-5903 (JLR)

**Joint Request to Extend Deadline for Opposition/Reply to Defendants’  
Motion to Dismiss & Adjourn Pre-Trial Conference Until After Briefing Is Submitted**

Your Honor:

I am one of the attorneys representing the Plaintiff in the above-referenced action.

Defendants’ Motion to Dismiss, filed on September 22, 2023, is pending before the Court at Dkt. 18. Under local Rules, Plaintiff’s opposition deadline is October 6, 2023; and Defendants’ Reply deadline is October 12, 2023. The parties jointly request that the following schedule be set for opposition and reply briefing:

Plaintiff’s Opposition:	October 18, 2023
Defendant’s Reply:	November 3, 2023

This is the first request to extend these briefing deadlines.

Additionally, the parties jointly request that the Initial Pre-Trial Conference currently scheduled for October 24, 2023, be adjourned until after briefing on the pending Motion to Dismiss has been fully submitted.

Respectfully submitted,

/s/ Miriam Tauber  
Miriam Tauber  
*Attorney for Plaintiff*

cc (via ECF): all parties

The request is GRANTED. Plaintiff’s opposition to the motion to dismiss shall be filed by **October 18, 2023**, and Defendant’s reply shall be filed by **November 3, 2023**. The Initial Pretrial Conference is adjourned to **November 7, 2023** at 10:30 a.m. in Courtroom 20B.

Dated: September 29, 2023  
New York, New York

**SO ORDERED.**

Jennifer Rochon  
**JENNIFER L. ROCHON**  
United States District Judge